

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: ) Case No.: 16-22388-GLT  
 )  
Ronald W. Hallas & ) Chapter 13  
Kristen M. Hallas, )  
 )  
Debtors. ) Related to Doc # Claim #14  
 )  
Key Bank, N.A. as S/B/M to First )  
Niagra Bank, N.A. )  
 ) Document # \_\_\_\_\_  
Movant, )  
 )  
v. )  
 )  
Ronald W. Hallas & Kristen M. Hallas, )  
WINNECOUR, Ch. 13 Trustee, )  
 )  
Respondents. )

**DECLARATION IN RESPONSE TO NOTICE OF MORTGAGE PAYMENT CHANGE**

**AND NOW** comes the Debtors, Ronald W. Hallas & Kristen M. Hallas, by and through their undersigned counsel, Dennis J. Spyra, Esq., and files the within Declaration in Response to Notice of Mortgage Payment Change, and in support thereof, avers as follows:

1. The undersigned has reviewed the Notice of Mortgage Payment Change filed by Key Bank, N.A. as S/B/M to First Niagra Bank, N.A., (hereinafter "Key Bank") at Claim #14 as filed in this case, and has determined that the estate will not be adversely affected if the mortgage payment change as requested by the Bank is as allowed, **since this payment is lower than the amount allotted to Key Bank under the Plan.**
2. The new post-petition monthly mortgage payment of \$503.62, as requested by the Bank, is effective August 15, 2021, as per Notice of Modification filed by the Bank on July 22, 2021.

**WHEREFORE**, the Debtors ask this Court to allow the payment change as requested by the Bank at Claim #14 in the above-styled case and, and to grant such other and further relief as deemed necessary in furtherance of this matter.

Respectfully submitted,  
/S/ DENNIS J. SPYRA, ESQ.  
Dennis J. Spyra, Esquire  
PA ID # 46188  
1711 Lincoln Way  
White Oak, PA 15131  
412-673-5228  
[attorneyspyra@dennisspyra.com](mailto:attorneyspyra@dennisspyra.com)